GODFREY KAHN S.C.

Direct: 608-284-2629
JGregor@gklaw.com

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Via ECF

Hon. William M. Conley
United States District Court
120 N. Henry Street, Room 320
Madison, WI 53703

      RE: *Wisconsin Alumni Research Foundation v. Apple Inc.*
               W.D. Wis. Case No. 3:14-cv-062-wmc

Dear Judge Conley:

Because Apple continues to release products that WARF submits infringe its United States Patent No. 5,781,752, WARF is compelled to initiate a new lawsuit with the attached Complaint, which was filed today in this Court, Case No. 15-cv-621. It was WARF's intent that all products be adjudicated in a single case, but Apple obtained an Order during discovery that effectively required that a lawsuit against new products be brought in a separate case.

In particular, Apple just released its new iPhone 6S, iPhone 6S Plus, and iPad Pro with the new A9 and A9x processors. These new Apple products are not at issue in the current lawsuit pending before Your Honor, in Case No. 14-cv-00062-wmc. During discovery in the current case, Magistrate Judge Crocker granted Apple's motion to foreclose discovery on unreleased processors and expressly contemplated that those products could be addressed in a subsequent lawsuit. *See* Dkt. 72, 10/31/2014 Tr. at 28, 32-33 (denying discovery on future products, including "the A9 and A10," and stating: "But for case management purposes, we've got to draw the line somewhere, so that's what we're doing here, with the full recognition that maybe ***there will be a subsequent lawsuit involving the new chips*** and the new technology in the future. But that's not the concern in this lawsuit.") (emphasis added).

WARF respectfully submits the enclosed courtesy copy of the new Complaint so that the Court is fully informed of developments in this related case.

               Respectfully submitted,

               GODFREY & KAHN, S.C.

               s/ Jennifer L. Gregor

               Counsel for Wisconsin Alumni Research Foundation

Encl.

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